

KIMBERLY P. STEIN, ESQ.
Nevada Bar No. 8675
kps@fdlawlv.com
FLANGAS DALACAS LAW GROUP
3275 South Jones Boulevard, Suite 105
Las Vegas, NV 89146
Telephone: (702) 307-9500
Attorneys for Plaintiff/Counterclaim Defendant Tsai-Lu Shen

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TSAI-LU SHEN, an individual,
Plaintiff,

v.

MICHELLE LACOUR, an individual; DOES I-X,
inclusive; and ROE CORPORATIONS I-X,
inclusive,
Defendants.

MICHELLE LACOUR,
Counterclaimant,

v.

TSAI-LU SHEN,
Counterclaim
Defendant,

MICHELLE LACOUR,
Third-Party Plaintiff,

v.

JAYSON BAYBUTT and PUBCO
REPORTING SOLUTIONS, INC.,
Third-Party Defendants.

Case No: 2:19-CV-01564-JAD-VCF

**STIPULATION AND PROPOSED
ORDER TO EXTEND PLAINTIFF
TSAI-LU SHEN'S DEADLINE TO
FILE ITS RESPONSE TO
COUNTERCLAIM
(ECF NO. 79 AND ECF NO. 109)**

(First Request)

Pursuant to Local Rule 7-1, Plaintiff/Counterclaim Defendant, Tsai-Lu Shen's,
("Shen"), and Defendant/Counterclaimant Michelle LaCour's ("Defendant" or "LaCour")
by and through their counsel of record, hereby stipulate and agree as follows:

1 1. To continue Plaintiff's deadline to file his response to the remaining
2 Counterclaims, extending extend the deadline from February 16, 2021 to and including
3 March 16, 2021.

4 2. Plaintiff expressly reserves all defenses or objections to the lawsuit and the
5 right to file additional claims.

6 3. This Stipulation is based upon the fact that all parties are in settlement
7 discussions and the additional time is necessary for the parties to engage in talks and
8 attempt to finalize a universal settlement.

9 Respectfully submitted by:

10 Dated: February 12, 2021

11 /s/ Kimberly P. Stein
12 KIMBERLY P. STEIN, ESQ.
13 Nevada Bar No. 8675
14 FLANGAS DALACAS LAW GROUP
15 3275 S. Jones Blvd., Suite 105
16 Las Vegas, NV 89146
17 *Attorneys for Plaintiff/Counterclaim*
18 *Defendant Tsai-Lu Shen*

Dated: February 12, 2021

/s/John H. Jamnback
JOHN K. GALLAGHER ESQ.
Nevada Bar No. 956
S. TIMOTHY SUMMERS, ESQ.
Nevada Bar No. 12285
PATRICK H. GALLAGHER, ESQ.
Nevada Bar No. 14875
GUILD, GALLAGHER, FULLER, LTD.
100 W. Liberty St., Ste. 800
Reno, Nevada 89501
JOHN H. JAMNBACK, ESQ.
Washington State Bar No. 29872
(pro hac vice approved)
YARMUTH LLP
1420 Fifth Ave., Suite 1400
Seattle, WA 98101
Attorneys for Defendant Michelle LaCour

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22 **IT IS SO ORDERED.**

23 Dated this 18th day of February, 2021.

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26 **UNITED STATES MAGISTRATE JUDGE**